

TIFFANY & BOSCO, P.A.

Ace C. Van Patten, Esq.
Nevada Bar No. 11731
Krista J. Nielson, Esq.
Nevada Bar No. 10698
10100 W. Charleston Boulevard, Suite 220
Las Vegas, NV 89135
Telephone: 702 258-8200
Fax: 702 258-8787
nvbk@tblaw.com
TB File No. 17-73290

Attorneys for *Secured Creditor* JPMorgan Chase Bank, National Association

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

IN RE:

JOHNNY TARVER,

Debtor.

BK Case No. 19-12115-abl

Chapter 13

**LIMITED RESPONSE TO MOTION
TO ALLOW DEBTOR TO SELL REAL
PROPERTY LOCATED AT 1255
KENWOOD RD., SANTA BARBARA,
CA 93109**

LIMITED RESPONSE TO MOTION TO SELL REAL PROPERTY

JPMorgan Chase Bank, National Association., Secured Creditor in the above-entitled Bankruptcy proceeding, hereby submits the following the following limited response to the Debtors' Motion to Sell Real Property located at 1255 Kenwood Rd., Santa Barbara, CA 93109.

Secured Creditor, as second lien holder, does not oppose the sale of the real property provided Secured Creditor's lien will be paid in full subject to the sale closing on within 90 days from the date of the Court's Order and sale is subject to a proper payoff quote; or that any extension of the closing date or sale short of full payoff be subject to Secured Creditor's

1 final approval. Further, funds from the sale should be received by Secured Creditor within
2 ninety (90) days from the date of the Court's order, unless otherwise agreed to by Secured
3 Creditor.

4 DATED this 3rd day of April, 2020.

5
6 **TIFFANY & BOSCO, P.A.**

7 By /s/ Ace C. Van Patten, Esq.
8 ACE C. VAN PATTEN, ESQ.
9 Attorney for Secured Creditor
10 10100 W. Charleston Boulevard, Suite 220
11 Las Vegas, NV 89135
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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

1. On this 3rd day of April, 2020, I served the following documents:

**LIMITED RESPONSE TO MOTION TO ALLOW DEBTOR TO SELL REAL
PROPERTY LOCATED AT 1255 KENWOOD RD., SANTA BARBARA, CA
93109**

2. I caused to be served the above-named document by the following means to the
persons as listed below:

X a. ECF System

Christopher Patrick Burke
atty@cburke.lvcoxmail.com
Attorney for Debtors

Kathleen A. Leavitt
courtsecf3@las13.com
Trustee

1
2 **X b. United States mail, postage fully prepaid:**

3 Christopher Patrick Burke
4 218 S Maryland Pky.
5 Las Vegas, NV 89101
6 Attorney for Debtors

7 Johnny Tarver
8 1920 Asburn Dr.
9 North Las Vegas, NV 89032
10 Debtor

11 **I declare under penalty of perjury the foregoing is true and correct.**

12 DATED this 3rd day of April, 2020.

13 By: /s/ Michelle Benson
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